

Jordan Dentler Segall
Felipe De Jesus Hernandez
Munger, Tolles & Olson LLP
350 South Grand Avenue
Los Angeles, CA 90071
213-683-9208
jordan.segall@mto.com
felipe.hernandez@mto.com

Trevor Kosmo
Aseem Mehta
Asian Law Caucus
55 Columbus Ave.
San Francisco, CA 94111
628-215-8451
trevork@asianlawcaucus.org
aseemm@asianlawcaucus.org

Amaris Montes, pro hac vice
Lily Novak, pro hac vice
RIGHTS BEHIND BARS
416 Florida Ave. NW #26152
Washington, D.C. 20001
Telephone: (202) 540-0029
amaris@rightsbehindbars.org
ily@rightsbehindbars.org

Lisa Knox (SBN 279406)
Priya Arvind Patel (SBN 295602)
CALIFORNIA COLLABORATIVE FOR
IMMIGRANT JUSTICE
1999 Harrison St #1800
Oakland, CA 94612
(510) 230-2746
lisa@ccijjustice.org
priya@ccijjustice.org

Counsel for Plaintiff Sylvia Ahn

Cheryl Wilke
Lewis Brisbois Bisgaard & Smith
110 SE 6th Street Ste 2600
Fort Lauderdale, FL 33301
954-495-2220
cheryl.wilke@lewisbrisbois.com

Seunghyun Sim
Lewis Brisbois Bisgaard & Smith LLP
633 W 5th St, Ste 4000
Los Angeles, CA 90071-2074
213-580-6361
Celine.Sim@lewisbrisbois.com

Counsel for Defendant GEO Group, Inc

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

SYLVIA AHN,

Plaintiff,

vs.

GEO GROUP, INC., et al.,

Defendants.

Case No. 1:22-cv-00586-CDB

**FIRST JOINT STIPULATION TO
EXTEND TIME TO RESPOND TO
DISCOVERY PENDING
MEDIATION**

Pursuant to Rule 83 of the Federal Rules of Civil Procedure and Local Rule 144 for the United States District Court for the Eastern District of California, Plaintiff, Sylvia Ahn, and Defendant, GEO Group, Inc, by and through their attorneys, hereby jointly agree to extend the time to respond to GEO Group’s “Rule 34 Demands for Inspection and Production of Documents, Electronically Stored Information and Tangible Things,” which includes GEO Group’s first set of interrogatories and request for document production, dated September 23, 2024, for twenty-eight (28) days to November 20, 2024, while the parties pursue mediation. This is the parties first request for an extension related to said discovery requests.

Dated: October 22, 2024

Respectfully submitted,

/s/ Jordan Segall

Jordan Dentler Segall
Felipe De Jesús Hernández
Munger, Tolles & Olson LLP
Attorneys for Plaintiff

Dated: October 22, 2024

Respectfully submitted,

/s/ Cheryl Wilke

Cheryl Wilke
Seunghyun Sim
Lewis Brisbois Bisgaard & Smith
Attorneys for GEO Group, Inc.